

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE**

SUSAN SHOEMAKER,)	
)	
Plaintiff,)	
)	
v.)	No.: 08 cv 14
)	
CHELCIE McCONNELL and)	Jury Trial Demanded
STACEY McCONNELL,)	
)	
Defendants.)	

ANSWER TO COMPLAINT

1. Denied.
2. Denied.
3. Denied.
4. Admitted.
5. Admitted.
6. Admitted.
7. Admitted.
8. Denied.

COUNT I

9. Defendants repeat answers to paragraphs 1 through 8.
10. Denied.

COUNT II

11. Defendants repeat answers to paragraphs 1 through 10.
12. Admitted.
13. Denied.

COUNT III

- 14. Defendants repeat answers to paragraphs 1 through 13.
- 15. Denied.
- 16. Denied.

AFFIRMATIVE DEFENSES

- 17. The Court lacks subject matter jurisdiction.
- 18. The Court lacks personal jurisdiction.
- 19. There is improper venue in that the accident occurred in Ohio and the defendants are residents of Ohio.
- 20. There is insufficiency of process upon the defendants.
- 21. There is insufficiency of service of process upon the defendants.

CASARINO, CHRISTMAN & SHALK, P.A.

/s/ Stephen P. Casarino
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DATED: February 18, 2008

CERTIFICATE OF SERVICE

I, Stephen P. Casarino, Esq., hereby certify that I have caused to be deposited in the mailbox at 800 North King Street, Suite 200, Wilmington, DE 19801, on this 18th day of February 2008, a true and correct copy of the attached Notice of Deposition to:

Vincent J.X. Hedrick, II
Law office of Beverly L. Bove
1020 West 18th Street, Suite 2
P.O. Box 1607
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